

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Broadband Telecom, Inc.)
(Licensee))
)
And) **File No.: ITC-214-20050330-00126**
Company Shareholder, Bankim Brahmhatt)
(“Transferor” and Beneficial Transferee)) **FRN(s):0013168729 and 0013446471**
)
FRN: 0024975872)
)
And)
BB Carrier LLC)
FRN: 0024975757)
)
And)
BB Group LLC)
FRN: 0024976086)
)
(Transferees))
)
Application for *Pro Forma* Transfer Control of)
International facilities-based and resale)
Authority Pursuant to Section 214 of the)
Communications Act of 1934, as amended.)
)
)
)

**APPLICATION FOR PRO FORMA TRANSFER OF CONTROL
OF INTERNATIONAL AUTHORITY OF
BROADBAND TELECOM, INC.**



By and through its Attorney:
Edward A. Maldonado, Esq.

The Law Offices of Edward A. Maldonado, P.A.
2850 Douglas Road, Suite 303, Coral Gables, FL 33134
Tel: 305-477-7580 Fax: 305-477-7504 Direct Line 786-292-0459
E-mail: eam@maldonado-group.com www.maldonado-group.com

TABLE OF APPLICATION CONTENTS

	Page
PETITION	
I. INTRODUCTION.....	4
II. REQUEST FOR STREAMLINE PROCESSING.....	5
III. DESCRIPTION OF THE APPLICANTS & TRANSACTION.....	6
a. Broadband Telecom, Inc.....	6
b. Bankim Brahmbhatt.....	6
c. BB Group, LLC. d/b/a Bankai Group.....	7
d. BB Carrier, LLC. d/b/a Bankai Carrier.....	7
IV. TRANSFER IN THE PUBLIC INTEREST.....	8
V. 47 C.F.R. § 63.12 INFORMATION.....	9
VI. 47 C.F.R. § 63.18 INFORMATION.....	10
VII. CONCLUSION.....	14
VIII. VERIFICATION OF APPLICATION.....	15
IX. CERTIFICATION OF APPLICANT – BB Carrier.....	16
X. CERTIFICATION OF APPLICANT – BB Group.....	17
XI. CERTIFICATION OF APPLICANT – Licensee.....	18
XII. DIAGRAM OF PRE-TRANSFER/POST TRANSFER OWNERSHIP.....	19

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Broadband Telecom, Inc.)
(Licensee))
)
And) **File No.: ITC-214-20050330-00126**
Company Shareholder, Bankim Brahmhatt)
(“Transferor” and Beneficial Transferee)) **FRN(s): 0013168729 and 0013446471**
)
FRN: 0024975872)
)
And)
BB Carrier LLC)
FRN: 0024975757)
)
And)
BB Group LLC)
FRN: 0024976086)
)
(Transferees))
)
Application for *Pro Forma* Transfer Control of)
International facilities-based and resale)
Authority Pursuant to Section 214 of the)
Communications Act of 1934, as amended.)
)
)
)

Application

Bankim Brahmhatt (“**Brahmbhatt**” or “**Transferor**”), sole stockholder of Broadband Telecom, Inc. (“**Licensee**”), together with BB Carrier LLC, a Delaware limited liability company solely held by Brahmhatt (“**BB Carrier**” or “**Transferee**”), herein collectively called the "Applicants," hereby give notice of and request record of a *pro forma* transfer of control of Broadband Telecom, Inc.’s the international authority pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. Section 214 *et. al.* (1982), and Section 63.18 of the Federal Communication Commission's (hereafter called “Commission”) Rules, 47 C.F.R. Section 63.18, in order to provide global or limited international facilities-based and resale services between the United States and international points, under a new corporate holding structure. In support of this application, the Applicants state as follows:

I. INTRODUCTION: Summary of the Contemplated Pro Forma Transfer

The **Licensee** is a telecommunications carrier that provides international telecommunications services pursuant to authority by the Commission under **ITC-214-20050330-00126**. Broadband Telecom provides both international telecommunications services to the public, other carriers, as well as consumers. **Licensee** has operated since May 31, 2005. Shares of the Licensee were initially held by two Shareholder: 1.) **Brahmbhatt**, who held 60% of all outstanding shares; and 2.) Mr. Amrish G. Patel (**Patel**), who held 40% of all outstanding shares. In late 2005, **Patel** left the business and redeemed his share to the Licensee in order to pursue a career outside of the field of telecommunications. No other shares were issued after the departure of **Patel**. Prior to and after the departure of **Patel**, **Brahmbhatt** has held substantial control of the Licensee. All outstanding and issued shares of the **Licensee** have been personally and exclusively owned by **Brahmbhatt** since the departure of Patel, and have not been reissued to any other person or entity. **Brahmbhatt**, now seeks to re-organize his personal holdings in the telecommunications sector under a corporate structure wherein all stock of the **Licensee** will be transferred to a holding company, **Transferee BB Carrier**, who will be controlled by another holding company, **Transferee BB Group**, which would be controlled by **Brahmbhatt**. The **Licensee** will thereafter be operated as a subsidiary of the holding company **Transferee BB Carrier**. See “Post Pro Forma Transfer” structure diagram on page 19 of this Application. The transfer contemplated will not affect Licensee’s existing:

- 1.) Control structure wherein **Brahmbhatt** may appoint more than 50 percent of the board of directors of the Licensee;
- 2.) **Brahmbhatt’s** control to appoint, promote, demote, or fire senior executives controlling the daily activities of the Licensee;
- 3.) **Brahmbhatt’s** existing ability to play an integral role in major management decisions of the Licensee;
- 4.) **Brahmbhatt’s** existing ability to receive monies or profits from the facilities’ operations; or
- 5.) **Brahmbhatt’s** existing unfettered use of all of Licensees facilities and equipment.¹

¹ See 47 CFR §§ 63.04(d), 63.24(d).

Insofar as the transfer contemplated is *non-substantive* and *pro forma* in nature, the applicants desire streamline treatment of this application. The result of this *pro forma* transfer will not affect the daily operations of the Licensee, discontinue or impair existing services, or affect any other continuing obligations to customers, other carriers or consumers of service.

Applicant **Brahmbhatt** presently holds one hundred percent (100%) of outstanding stock of the **Licensee**, a Delaware corporation. **Brahmbhatt** has been previously been approved by the Commission under the Licensee's original application. Applicant **Brahmbhatt** presently holds one hundred percent (100%) of membership units of **Transferee, BB Group**, a Delaware limited liability company, which holds one hundred percent (100%) of membership units of **Transferee, BB Carrier**, also a Delaware limited liability company. **Brahmbhatt** is a citizen of India and lawful permanent resident of the United States. **Transferee, BB Group**, is a Delaware limited liability company held by **Brahmbhatt** for investment and does not, and will not, provide international telecommunications services. **BB Group** is not affiliated with any foreign carrier in a destination market, nor does it have an affiliation with any dominant U.S. carrier whose international switched or private line services. **Transferee, BB Carrier**, is a Delaware limited liability company held by **BB Group** for particular investment into telecommunication businesses. **BB Carrier** is not affiliated with any foreign carrier in a destination market, nor does it have an affiliation with a dominant U.S. carrier whose international switched or private line services it seeks authority to resell.

The **Licensee** provides underlying carrier services and resold carrier service throughout the United States, but primarily in the states of Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Illinois, Iowa, Louisiana, Maryland, Massachusetts, Michigan, Nebraska, Nevada, New Jersey, New Mexico, New York, Ohio, Oregon, Pennsylvania, Texas, Utah, Virginia, Washington, and Wyoming. By granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market as well as such services in the states of California, Florida, New Jersey and New York. Competition will continue to benefit U.S. consumers with this *pro forma* transfer by maintaining service options and lowering prices.

Thus, the public interest will be served by the grant of this Application for *Pro Forma* Transfer of Control.

II. Request for Streamlined Processing as to Transferor and the Transferee

As related to **Transferor (Brahmbhatt)** and the **Transferee (BB Carrier)**, the Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to the Commission's Rules, found at 47 C.F.R. § 63.12(a). This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) because, immediately following the transactions: (1) No applicant or its affiliate(s), as defined in Section 3(1) of the Communications Act (hereafter called "Affiliates") combined shall hold a ten percent (10%) or more share of the interstate and/or interexchange market; and (2) the Applicants nor their Affiliates are, or will be, dominant with respect to any service before or after the transaction.²

In support of this Application, Applicants provide the following information:

II. Description of the Applicants

A. Broadband Telecom, Inc. ("Licensee")

The **Licensee**, Broadband Telecom, Inc., is a Delaware corporation operating from the State of New York and provides global facilities based and resold international telecommunications services to the public pursuant to 47 U.S.C § 214 *et. al.* under Commission Authority **ITC-214-20050330-00126**. **Licensee** is a non-dominant carrier under 47 CFR Section 63.03(b)(2)(i).

B. Bankim B. Brahmbhatt ("Transferor")

Bankim B. Brahmbhatt ("**Brahmbhatt**") is natural person and resident of the State of New York with domiciled at 80-02 Kew Gardens Road Suite 1040 Kew Gardens, New York 11415 for purposes of this Application. **Brahmbhatt** presently holds one hundred percent (100%) of **Licensee's** outstanding equity and stock. **Brahmbhatt** currently

² This Application satisfies the criteria for streamlined processing pursuant to Section 63.12(a) of the Commission's rules, because none of the provisions of Section 63.12(c) of the Commission's rules, that prevent streamlined treatment, apply to the proposed Transaction. No Applicant (Licensee, Brahmbhatt or Transferee) is affiliated with a foreign carrier in a destination market, nor do any have an affiliation with a dominant U.S. carrier whose international switched or private line services it seeks authority to resell. Pursuant to Section 63.12(a) of the Commission's rules, the Commission should deem this Application granted on the 15th day after the date of the public notice listing this Application as accepted for filing.

serves as President of the **Licensee**, and this management position will not change post-Transaction. **Brahmbhatt** possesses a collective thirty (30) years of experience in the field of telecommunications, and is citizen of India and lawful permanent resident of the United States. **Brahmbhatt** is not affiliated with any company holding a dominant position in any international market. Under the contemplated Transfer, **Brahmbhatt** will transfer his an equity interest in the **Licensee** into **Transferee (BB Carrier)** for financial organization purposes. This stock of **Brahmbhatt** in the **Licensee** will be transferred directly into **Transferee (BB Carrier)**, and no payment to **Brahmbhatt** will result under this transfer. Thereafter, Licensee will be structured under the holding company **BB Carrier**, which is wholly owned by **Transferee BB Group** under the control of the Applicant **Brahmbhatt**. See “Post Pro Forma Transfer” structure diagram on page 19 of this Application.

C. BB Carrier, LLC. d/b/a Bankai Carrier (“Transferee”)

The **Transferee, BB Carrier LLC**, is a Delaware limited liability company with its offices domiciled at 16192, Coastal Highway, Lewes, Delaware 19958-9776 (“BB Carrier”). **BB Carrier** is a company dedicated to **Brahmbhatt** in order for him to organize investment in the business of telecommunication services. Upon consummation of the Transfer, **BB Carrier** will hold a 100% stock position in the **Licensee**, and, will hold Board of Director appointments with voting rights equal to its equity position in the **Licensee**. **BB Carrier** will be represented on Broadband Telecom’s Board of Directors by **Brahmbhatt**.

D. BB Group, LLC. d/b/a Bankai Group (“Transferee”)

The direct owner of **BB Carrier, LLC d/b/a** and **Transferee, BB Group LLC**, d/b/a Bankai Group is a Delaware limited liability company with its offices domiciled at 16192, Coastal Highway, Lewes, Delaware 19958-9776 (“BB Group”). **BB Group** is a company dedicated to **Brahmbhatt** in order for him to invest into the business sectors of information technology and telecommunication services. Upon consummation of the Transfer, **BB Group** will hold a 100% membership interest in **BB Carrier** who shall hold a 100% stock position in the **Licensee**. **BB Group** will hold all Board of Director

appointments with voting rights equal to its equity position in **BB Carrier**. **BB Group** is 100% held by **Brahmbhatt** who is the sole LLC member.

III **Public Interest Considerations:**

The Applicants believe that the added competition the Transaction contemplated and this Transfer of Control will bring to the market will benefit the consumers of United States-international telecommunications services, and specifically those in the State of Florida and in territories where Broadband Telecom, Inc. presently provides services. This includes competitive pricing of services and increased availability of a variety of innovative service options. Therefore, grant of this Application will further the public interest.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Broadband Telecom, Inc.)
(Licensee))
)
And) **File No.: ITC-214-20050330-00126**
Company Shareholder, Bankim Brahmhatt)
(“Transferor” and Beneficial Transferee)) **FRN(s):0013168729 and 0013446471**
)
FRN: **0024975872**)
)
And)
BB Carrier LLC)
FRN: **0024975757**)
)
And)
BB Group LLC)
FRN: **0024976086**)
)
(Transferees))
)
Application for *Pro Forma* Transfer Control of)
International facilities-based and resale)
Authority Pursuant to Section 214 of the)
Communications Act of 1934, as amended.))
)
_____)

Application Attachment I.
(Information pursuant to 47 CFR § 63.12)

The following information is submitted, as required by 47 CFR § 63.12 of the Commission’s Rules, in support of the Applicants’ request for *pro forma* transfer of Control of Broadband Telecom’ authorization:

In Response to Question 9 of the Application: The Applicants respectfully requests streamline processing pursuant to 47 CFR § 63.12 and certifies that:

1. It is not affiliated with a foreign carrier in a destination market it seeks authority to serve;
2. It has no affiliation with a dominant U.S. carrier whose international switched or private line services the Applicants or the Licensee seeks authority to resell, either directly or indirectly through the resale of another reseller’s services;
3. It does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.
4. The Commission has not informed any Applicants or Broadband Telecom in writing that this Application is not eligible for streamlined processing.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Broadband Telecom, Inc.)
(Licensee))
)
And) **File No.: ITC-214-20050330-00126**
Company Shareholder, Bankim Brahmhatt)
(“Transferor” and Beneficial Transferee)) **FRN(s):0013168729 and 0013446471**
)
FRN: 0024975872)
)
)
And)
BB Carrier LLC)
FRN: 0024975757)
)
)
And)
BB Group LLC)
FRN: 0024976086)
)
)
(Transferees))
)
)
Application for *Pro Forma* Transfer Control of)
International facilities-based and resale)
Authority Pursuant to Section 214 of the)
Communications Act of 1934, as amended.)
)
)
_____)

Application Attachment II.
(Information pursuant to 47 CFR § 63.18)

The following information is submitted, as required by 47 CFR § 63.18 of the Commission’s Rules, in support of Applicant’s request for authorization:

47 CFR § 63.18(a): The names, addresses and telephone numbers of the Applicants are as follows:

Licensee:
Broadband Telecom, Inc. **FRN(s):0013168729 and 0013446471**
80-02 Kew Gardens Road Suite 1040
Kew Gardens, New York 11415
Tel: (818) 450-5771
Attn: Mr. Bankim Brahmhatt, President

Transferor/Beneficial Transferee: FRN: **0024975872**
Bankim Brahmhatt (a natural person)
80-02 Kew Gardens Road Suite 1040
Kew Gardens, New York 11415
Tel: (818) 450-5771

Transferee:
BB Carrier LLC. d/b/a Bankai Carrier FRN: **0024975757**
16192, Coastal Highway,
Lewes, Delaware 19958-9776
Attn: Mr. Bankim Brahmhatt

Beneficial owner of Transferee: FRN: **0024976086**
BB Group LLC. d/b/a Bankai Group
16192, Coastal Highway,
Lewes, Delaware 19958-9776
Attn: Mr. Bankim Brahmhatt, Member

47 CFR § 63.18(b): Jurisdiction of Persons and Organizations

- (1) Licensee: **Broadband Telecom, Inc.** is a **Corporation** incorporated under the laws of the **State of Delaware**.
- (2) Transferor/ Beneficial Transferee: **Bankim Brahmhatt** is a natural person and resident of the **State of New York**. **Bankim Brahmhatt** is the sole Member of **BB Group, LLC d/b/a Bankai Group**, a Delaware limited liability company, which is the sole owner of **BB Carrier, LLC d/b/a Bankai Carrier**, a Delaware limited liability company.
- (3) Transferee: **BB Carrier, LLC d/b/a Bankai Carrier** is a Limited Liability Company formed under the laws of the **State of Delaware**.
- (4) Transferee: **BB Group, LLC d/b/a Bankai Group** is a Limited Liability Company formed under the laws of the **State of Delaware**

48 CFR § 63.18(c): Correspondence concerning this application should be sent to:

For: **Broadband Telecom, Inc.**
Esq.
80-02 Kew Gardens Road Suite 1040
Kew Gardens, New York 11415
Tel: (818) 450-5771
Attn: Mr. Bankim Brahmhatt, President

For: **Bankim Brahmhatt**
Brahmhatt,
80-02 Kew Gardens Road Suite 1040
Kew Gardens, New York 11415
Tel: (818) 450-5771
Attn: Mr. Bankim Brahmhatt

With Copy to: **Edward A. Maldonado,**
Maldonado Law
2850 Douglas Road Suite 303
Coral Gables, FL 33134
Tel: 305-477-7580 Fax: 305-477-7504
E-mail: eam@maldonado-group.com
on behalf of Broadband Telecom,
BB Group & BB Carrier.

For **BB Carrier LLC d/b/a Bankai Carrier**
16192, Coastal Highway,
Lewes, Delaware 19958-9776
Attn: Mr. Bankim Brahmbhatt, Manager.

For **BB Group LLC d/b/a Bankai Group**
16192, Coastal Highway,
Lewes, Delaware 19958-9776
Attn: Mr. Bankim Brahmbhatt, Manager.

In Response to Question 14 and 15 of FCC 214 Application:

47 CFR § 63.18(d): Broadband Telecom, Inc. has previously received authority under Section 214 of the Act. Applicant **Brahmbhatt** is the only stockholder in the **Licensee** and has been previously approved by the Commission as owner of the **Licensee**. **BB Carrier LLC** has not received previous authority from the Commission under Section 214 of the Act.

47 CFR § 63.18(e): Applicants request approval for global or limited facilities-based and resale services under Section 214 of the Act and pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's Rules. Applicant is not applying for authority to acquire facilities or to provide services not covered by paragraphs (e)(1) through (e)(3) of Section 63.18. Applicant is not seeking facilities-based authority under paragraph (e)(4) of Section 63.18.

47 CFR § 63.18(g): Applicants will use previously authorized facilities to provide the services requested by the Application. Applicants are excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules, specifically 47 C.F.R. § 1.1306.

CFR § 63.18(h): Following the completion of the *pro forma* transfer between the Applicants the information regarding the 10% or greater direct or indirect owners of Broadband Telecom, Inc. shall be as follows:

Name :	BB Carrier LLC d/b/a Bankai Carrier
Address:	16192, Coastal Highway, Lewes, Delaware 19958-9776
Citizenship:	Delaware Limited Liability Company
Principal Business:	Private Investment Company
Ownership:	100%

Following the completion of the *pro forma* transfer between the Applicants the information regarding the 10% or greater direct or indirect owners of **BB Carrier LLC d/b/a Bankai Carrier** shall be as follow:

Name : **BB Group LLC d/b/a Bankai Carrier**
Address: 16192, Coastal Highway, Lewes, Delaware 19958-9776
Citizenship: Delaware Limited Liability Company
Principal Business: Private Investment Company
Ownership: 100%

Following the completion of the *pro forma* transfer between the Applicants the information regarding the 10% or greater direct or indirect owners of **BB Group LLC d/b/a Bankai Group** shall be as follows:

Name: **Mr. Bankim B. Brahmhatt**
Address: 80-02 Kew Gardens Road Suite 1040,
Kew Gardens, New York 11415
Citizenship: India / lawful permanent resident of the United States
Principal Business: Telecommunications
Ownership: 100%

47 CFR § 63.18(i): The Applicants, Brahmhatt, BB Group and BB Carrier, LLC, respectively certify that they are not affiliated with any foreign facilities-based carriers or US dominant carriers.

47 CFR § 63.18(j): The Applicants, Brahmhatt, BB Group and BB Carrier, LLC, respectively certify that they do not seek to provide international telecommunication services to any destination country for which any of the following are true:

1. They are not a foreign carrier in that country; or
2. They do not control a foreign carrier in that country; or
3. Any entity that owns more than twenty-five percent (25%) of **BB Carrier, LLC** or the **Licensee** or that will control the Licensee after transaction, will control a foreign carrier in that country.

47 CFR § 63.18(k): Not Applicable.

47 CFR § 63.18(l): Not Applicable.

47 CFR § 63.18(m): Not Applicable.

47 CFR § 63.18(n): The Applicants and **Broadband Telecom, Inc.** certify that they has not agreed and will not agree in the future to accept any direct or indirect special concessions from a foreign carrier or administration with regards to traffic or revenue flows between the United States and any foreign countries the company is authorized to serve.

47 CFR § 63.18(o): The **Applicants** certify that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

47 CFR § 63.18(p): The **Applicants** respectively request Streamline Processing of this Application pursuant to Section 63.12 of the Commission's Rules under 47 C.F.R. § 63.12.

CONCLUSION

In conclusion of the foregoing Application and Attachments, the Applicants, by and through Bankim Brahmhatt, certify that all of the information in this application is accurate and correct. For these reasons, respectfully requests that the Commission grant this application.

Respectfully submitted,

By: /s/ Bankim Brahmhatt /s/

Name **Bankim Brahmhatt**

Title: President of Broadband Telecom, Inc. (a Delaware company)

By and through their attorney:



/s/ Edward A. Maldonado /s/

Edward A. Maldonado, Esq.

MALDONADO LAW GROUP

2850 Douglas Road, Suite 303 Coral Gables, FL 33134

Tel: 305-477-7580 Fax: 305-477-7504 Direct Line 786-292-0459

www.maldonado-group.com

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Broadband Telecom, Inc.)
(Licensee))
)
And) **File No.: ITC-214-20050330-00126**
Company Shareholder, Bankim Brahmhatt)
(“Transferor” and Beneficial Transferee)) **FRN(s):0013168729 and 0013446471**
)
FRN: 0024975872)
)
)
And)
BB Carrier LLC)
FRN: 0024975757)
)
)
And)
BB Group LLC)
FRN: 0024976086)
)
)
(Transferees))
)
)
Application for *Pro Forma* Transfer Control of)
International facilities-based and resale)
Authority Pursuant to Section 214 of the)
Communications Act of 1934, as amended.)
)
)
_____)

Pro Forma Transfer Application

VERIFICATION

I, Bankim Brahmhatt, state that I am the President of Broadband Telecom, Inc.; that I am authorized to make this Verification on behalf of the Applicants; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this November 3, 2015.

By: /s/ Bankim Brahmhatt /s/
Name **Bankim Brahmhatt**
Title: President of
Broadband Telecom, Inc. (a Delaware company)

CERTIFICATION OF APPLICANT – BB Carrier, LLC. d/b/a Bankai Carrier

The undersigned hereby certifies, on behalf of BB Carrier, LLC with respect to the foregoing application for Section 214 Authority to provide international services that:

1. BB Carrier, LLC is not affiliated with any foreign carrier in any of the countries to which BB Carrier, LLC proposes to provide service in the foregoing application.
2. BB Carrier, LLC will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.P.R. 63.21-23
3. BB Carrier, LLC does not seek to provide international telecommunications service to any destination where: (1) BB Carrier, LLC is a foreign caller in that country; (2) BB Carrier, LLC controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in BB Carrier, LLC, or controls BB Carrier, LLC, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of BB Carrier, LLC and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.
4. BB Carrier, LLC has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. BB Carrier, LLC is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this November 3, 2015.

By: /s/ Bankim Brahmhatt /s/

Name **Bankim Brahmhatt**

Title: Manager of BB Carrier, LLC. (a Delaware company)

CERTIFICATION OF APPLICANT – BB Group, LLC. d/b/a Bankai Group

The undersigned hereby certifies, on behalf of BB Group, LLC with respect to the foregoing application for Section 214 Authority to provide international services that:

1. BB Group, LLC is not affiliated with any foreign carrier in any of the countries to which BB Carrier, LLC proposes to provide service in the foregoing application.
2. BB Group, LLC by and through BB Carrier, LLC will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.P.R. 63.21-.23
3. BB Group, LLC by and through BB Carrier, LLC does not seek to provide international telecommunications service to any destination where: (1) BB Carrier, LLC is a foreign caller in that country; (2) BB Carrier, LLC controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in BB Carrier, LLC, or controls BB Carrier, LLC, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of BB Carrier, LLC and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.
4. BB Group, LLC has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. BB Group, LLC is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this November 3, 2015.

By: /s/ Bankim Brahmhatt /s/

Name **Bankim Brahmhatt**

Title: Member of BB Group, LLC. d/b/a Bankai Group (a Delaware company)

CERTIFICATION OF APPLICANT - LICENSEE

The undersigned hereby certifies, on behalf of Broadband Telecom, Inc., Inc. with respect to the foregoing application for Section 214 Authority to provide international services that:

1. Broadband Telecom, Inc. is not affiliated with any foreign carrier in any of the countries to which Broadband Telecom, Inc. proposes to provide service in the foregoing application.
2. Broadband Telecom, Inc. will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.P.R. 63.21-.23
3. Broadband Telecom, Inc. does not seek to provide international telecommunications service to any destination where: (1) Broadband Telecom, Inc. is a foreign caller in that country; (2) Broadband Telecom, Inc. controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Broadband Telecom, Inc., or controls Broadband Telecom, Inc., controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of Broadband Telecom, Inc. and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.
4. Broadband Telecom, Inc. has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. Broadband Telecom, Inc. is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this November 3, 2015.

By: /s/ Bankim Brahmhatt /s/

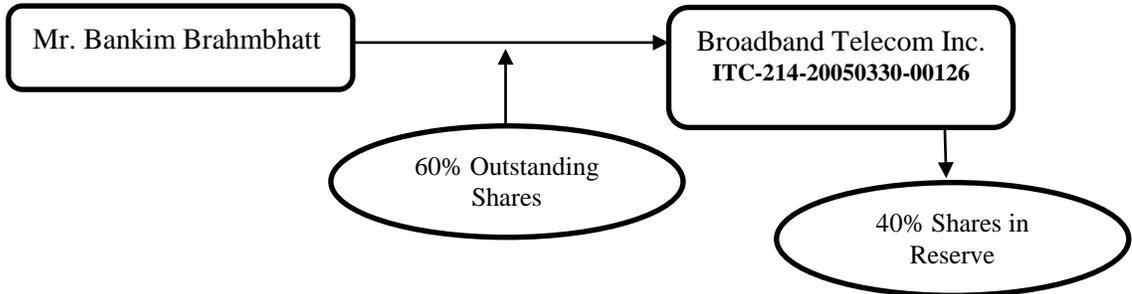
Name **Bankim Brahmhatt**

Title: President

Broadband Telecom, Inc. (a Delaware company)

DIAGRAM OF PRE-TRANSFER/POST TRANSFER OWNERHSIP

Pre-Pro Forma Transfer



Post Pro Forma Transfer

